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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARIO ALBERTO BOJORQUEZ-
15 MANRIQUE,

16 Defendant.

Case No. 2:19-cr-00153-APG-DJA

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(Third Request)

ORDER

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Robert Knief, Assistant United States Attorney, counsel
20 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
21 Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Mario Alberto
22 Bojorquez-Manrique, that the pretrial motion deadline be continued thirty (30) days.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including January 2, 2020, to file any and all pretrial motions and notice of
25 defense, currently due November 25, 2019.
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including January 16, 2020, to file any and all responsive pleadings, currently
3 due December 9, 2019.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including January 23, 2020, to file any and all replies to dispositive motions,
6 currently due December 16, 2019.

7 1. Counsel for the defendant needs additional time to conduct investigation in this
8 case in order to determine whether there are any pretrial issues that must be litigated and
9 whether the case will ultimately go to trial or will be resolved through negotiations.

10 2. The defendant is incarcerated and does not object to the continuance.

11 3. The parties agree to the continuance.

12 4. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow counsel for defendant sufficient time within which to be able to effectively and
14 complete investigation of the discovery materials provided.

15 5. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice.

17 This is the third stipulation to continue filed herein.

18 DATED this 25th day of November, 2019.

19 RENE L. VALLADARES
20 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

21 By /s/ Margaret W. Lambrose
22 MARGARET W. LAMBROSE
23 Assistant Federal Public Defender

By /s/ Robert Knief
ROBERT KNIEF
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARIO ALBERTO BOJORQUEZ-
7 MANRIQUE,

8 Defendant.

Case No. 2:19-cr-00153-APG-DJA

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to conduct investigation in this
14 case in order to determine whether there are any pretrial issues that must be litigated and
15 whether the case will ultimately go to trial or will be resolved through negotiations.

16 2. The defendant is incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to be able to effectively and
20 complete investigation of the discovery materials provided.

21 5. Additionally, denial of this request for continuance could result in a miscarriage
22 of justice.

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IT IS FURTHER ORDERED that the parties shall have to and including January 16, 2020 to file any all responses.

Dated: November 25, 2019.

